

## Brian Quiros

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**From:** Tisa, Kimberly  
**Sent:** Thursday, July 20, 2017 12:48 PM  
**To:** 'Mike Zarba'  
**Cc:** 'Doubleday, Edward'; 'Trombly, Gary'  
**Subject:** RE: CEC - Structural Steel Decontamination and Recycling

Mr. Zarba:

With respect to EPA's last comment pertaining to the high pressure decontamination, The Town states that this removal technique was "...determined to not be a cost effective approach". Please provide supporting documentation for this conclusion.

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**From:** Tisa, Kimberly  
**Sent:** Thursday, July 20, 2017 10:09 AM  
**To:** 'Mike Zarba' <mzarba@newmilford.org>  
**Cc:** Doubleday, Edward <EDoubleday@trcsolutions.com>; 'Trombly, Gary' <Gary.Trombly@ct.gov>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>  
**Subject:** RE: CEC - Structural Steel Decontamination and Recycling

Mr. Zarba:

I am now reviewing the May 24, 2017 Responses to EPA comments, which we received on May 30, 2017. At this point I am having difficulty with your response regarding the EMSL QA/QC info associated with the proposed approach for characterization of paint on structural steel (EPA Comment C.3.b).

The response was denoted as ATT 2: EMSL QC Data and appears to be tables with sample identifiers and % recoveries. I provide the following observations/comments:

- Without going back and looking at each and every laboratory report for the identifier, EPA cannot determine what these tables represent.
- At the top of some of the pages the title is "TUBE PCB SURROGATE RECOVERY". This makes no sense as it pertains to this project.
- On some of the data sheets the Report Limit and Conc. Refer to mg/Tube. EPA does not understand how this data relates to the project.
- On some of the sheets there is reference to Extraction Method "NIOSH 5503 Modified". EPA does not understand this extraction method for this project.

- On some of the sheet there is reference to Extraction Method 3550C, which is sonication. Method 3540 (Soxhlet) was required for solid samples under the Approval.
- There is also QA/QC information provided for Extraction Method 3510, which is a water extraction method. I am not sure what this pertains to.

Please clarify the above for the record and for my review.

Thank you.

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**From:** Mike Zarba [<mailto:mzarba@newmilford.org>]  
**Sent:** Friday, July 07, 2017 3:56 PM  
**To:** Tisa, Kimberly <[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)>  
**Subject:** Re: CEC - Structural Steel Decontamination and Recycling

Hi Kim:

Hope you are having a nice summer so far. Just checking in on the status of this review and to see if you and Gary have had a chance to discuss. As you may know we are at a standstill on this project unless/until this plan gets approved.

Thanks and please let me know if you need any additional information. Take Care,

***Michael F. Zarba, P.E.***  
Public Works Director  
Town of New Milford  
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On Wed, May 24, 2017 at 3:43 PM, Mike Zarba <[mzarba@newmilford.org](mailto:mzarba@newmilford.org)> wrote:

Attachment #4

***Michael F. Zarba, P.E.***

Public Works Director

Town of New Milford

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On Wed, May 24, 2017 at 3:41 PM, Mike Zarba <[mzarba@newmilford.org](mailto:mzarba@newmilford.org)> wrote:

Kim:

Please find attached the responses to your May 4, 2017 comments and the associated four (4) attachments. I will forward attachment 4 as a separate email as it is large.

I also have hard copies (in color where applicable) for both you and Gary, which I will send out via US Mail tomorrow.

Please let me know if you need anything additional or would like to discuss further.

Thank You,

***Michael F. Zarba, P.E.***

Public Works Director

Town of New Milford

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On Thu, May 4, 2017 at 11:08 AM, Tisa, Kimberly <[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)> wrote:

Mr. Zarba:

EPA has received PCB sampling data for paint samples collected from steel beams following decontamination of these beams using a low pressure water jet system. Documents provided to EPA on the structural steel beams include the following:

- ***Strategic Environmental Services: September 22, 2016 PCB Sampling Plan for CEC Structural Columns and Trusses.***
- *SDS*  
Truss and Column PCB Sampling Results. Transmitted by M. Zarba to K. Tisa via email on October 4, 2016.
- October 5, 2016. EPA (K. Tisa) notification to Town (M. Zarba) that steel beams were to be disposed as a  $\geq$  50 ppm PCB waste unless otherwise sampled to determine disposal requirements. Determination based on fact that PCBs above regulatory thresholds were identified during truss/column sampling.
- SDS identified sample locations for paint sampling. Description, map, and photo-log for samples transmitted by M. Zarba to K. Tisa via email on October 14, 2016
- ***Strategic Environmental Services, October 20, 2016 PCB Remediation Waste Pilot Study.***
- November 9, 2016. EPA (K. Tisa) comments to Town (M. Zarba) on PCB decontamination plan and that the results of the pilot study did not provide sufficient data/information to support proposed decontamination plan. Also requested that Town provide results of the SDS paint sampling results to EPA.
- *by Zarba*
- November 21, 2016. Transmittal of SDS paint sampling results to EPA (K.Tisa) by SDS with Partners letter dated November 16, 2016.
- *March 2, 2017 Proposed PCB Sampling Approach for Characterization of Paint on Structural Steel.*
- *April 19, 2017 Characterization of Paint on Structural Steel and Request for Authorization to Recycle (received by EPA on 4/24/17)*
- *May 1, 2017, Attachment 3 to April 19, 2017 submittal (received by EPA on May 2, 2017)*



Based on EPA's review of all documents listed above and its discussions with CTDEEP, EPA has identified additional comments/questions that will need to be addressed by the Town. The information presented does not clearly support the Town's position on waste classification of the structural steel at the Site.

EPA's comments are provided in the attachment to this email.

Upon review, should you have any questions, please contact us. We would request that any future discussion concerning the steel also include CTDEEP.

*Kimberly N. Tisa, PCB Coordinator*

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